

FEB 7 1997

Federal Communications Commission  
Office of SecretaryBefore the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
)  
Replacement of Part 90 by Part 88 )  
to Revise the Private Land Mobile )  
Radio Services and Modify the Policies ) PR Docket No. 92-235  
Governing Them )  
and )  
Examination of Exclusivity and )  
Frequency Assignment Policies of the )  
Private Land Mobile Radio Services )

To: Private Wireless Division,  
Wireless Telecommunications Division

**Comments of Public Service Electric and Gas Company**  
**on ITA Filing Concerning a Framework for Consolidation**  
**of the Private Land Mobile Radio Services**

In response to the Federal Communications Commission's (FCC) January 28, 1997, Public Notice<sup>1</sup>, Public Service Electric and Gas Company (PSE&G) hereby submits its comments on the consolidation plan for the private land mobile radio services filed by the Industrial Telecommunications Association (ITA). ITA's consolidation plan does not adequately protect PSE&G's vital communications and may threaten our ability to provide safe and reliable gas and electric service. In order to protect these operations,

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<sup>1</sup> DA 97-206.

PSE&G recommends that the FCC adopt the three-pool consolidation plan recommended by UTC, The Telecommunications Association.

## **I. Background**

Public Service Electric and Gas Company (PSE&G) is one of the top ten largest combined electric and gas companies in the United States and is New Jersey's oldest and largest regulated utility. It serves nearly three quarters of the state's population in a service area consisting of a 2,600-square-mile diagonal corridor across the state from Bergen to Camden Counties. PSE&G is the major supplier of electricity and gas in New Jersey, serving 2.2 million customers in more than 300 urban, suburban and rural communities, including New Jersey's six largest cities.

PSE&G delivers gas to more than 1.5 million residential and business customers in New Jersey. It owns and operates more than 15,000 miles of gas mains and can deliver up to 3 million therms of gas a day. In 1995, PSE&G transported 3.9 billion gas therms. Gas Service and Distribution offices are strategically located throughout the state assuring quick customer response. Approximately 3,300 employees work in PSE&G's gas area.

PSE&G's electric operations have an installed generating capacity of 10,400 megawatts, including three (3) nuclear generating plants — Hope Creek Generating Station, Peach Bottom Generating Station and Salem Generating Station. PSE&G operates one of the most reliable and cost-effective electric transmission and distribution

systems in the world, delivering electricity to 1.9 million residential and commercial customers. The system consists of more than 151,000 circuit miles. In addition, PSE&G operates 41 switching stations and 228 substations.

## **II. ITA's Two-Pool Plan Will Threaten PSE&G's Vital Operations**

Reliable, available radio channels are essential to PSE&G's electric and gas operations. PSE&G uses channels below 512 MHz for a variety of public safety-related purposes. PSE&G's gas operations use VHF high band to dispatch personnel to the scenes of fires to close gas valves. These VHF channels are also used to dispatch field crews to locations of reported gas leaks. By New Jersey regulation, we are required to respond to gas leaks within thirty (30) minutes. Compliance with this law would be impossible without reliable access to radio spectrum.

VHF channels are used by PSE&G in conjunction with the New Jersey state office of emergency management's EMRAD system. This system uses utility-owned and -maintained radios to provide interoperability among and between PSE&G and the state public safety agencies. PSE&G also uses VHF radio frequencies as part of the Emergency Alerting System near its Salem and Hope Creek Nuclear generating plants. At 150 locations in three states (New Jersey, Pennsylvania and Delaware), this system provides a warning in the case of incidents affecting public safety involving the nuclear plants. PSE&G's electric operations also use VHF channels to fulfill a variety of other vital needs, including demand side management operations to maintain the demand for

electric power on the electric grid, operations in switching stations and substations and communications with field crews.

By lumping our operations into the same frequency pool with less critical services with no additional protection for our operations, ITA's plan will no doubt result in additional cases of interference. Even with the existing radio pools, we have encountered interference from unauthorized operations in our band by commercial/business users. These users are less concerned with discipline and protocol in the use of shared frequencies because their operations do not require the same degree of reliability or availability and because the communications are supporting less critical functions.

Problems with interference from other users will undoubtedly increase if new, non-critical services are permitted to freely operate near PSE&G's vital communications frequencies. Non-critical licensees may not understand that vital operations are being supported by communications on nearby channels and that disruptions to these channels can result in disaster. Disruptions to a non-critical user's operations may only result in a financial loss; disruptions to PSE&G's communications with field crews could result in the loss of life.

### **III. PSE&G Supports UTC's Three Pool Consolidation Plan**

PSE&G supports the consolidation of the existing radio services into three (3) pools, as recommended by UTC. UTC's three-pool plan will protect PSE&G's vital operations by grouping us with users who share our need for reliable and secure access to

spectrum. Under the UTC plan, PSE&G and other utilities would be included in the "Public Service" pool along with railroad, petroleum, state and local government and other services that support emergency response services or which protect the nation's infrastructure.


In the event that the FCC insists on consolidating the radio services into two broad pools, PSE&G joins UTC in urging that utilities be included in the "Public Safety" category with the emergency response agencies with which we share a common need for reliable communications.

**WHEREFORE, THE PREMISES CONSIDERED,** PSE&G requests the Federal Communications Commission to take action in accordance with the views expressed in these comments.

Respectfully submitted,

**PSE&G**

By:

  
Jeffrey H. Katz  
Senior IT Consultant

**Public Service Electric and Gas Company**  
80 Park Place (C-10)  
Newark, NJ 07102-4194  
(201) 430-7572

Dated: February 7, 1997